

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JOHN TELLIHO,  
on behalf of himself, and all others  
similarly situated

Plaintiff,

v.

EAST WINDSOR TOWNSHIP and  
AMERICAN TRAFFIC SOLUTIONS,

Defendants.

)  
) Case No.: 3:12-cv-4800-PGS-LHG  
)  
) **JOINT SUPPLEMENTAL SUBMISSION**  
) **IN SUPPORT OF PLAINTIFF’S**  
) **UNOPPOSED MOTION TO GRANT**  
) **PRELIMINARY APPROVAL TO**  
) **PROPOSED CLASS ACTION**  
) **SETTLEMENT, TO APPROVE**  
) **DISTRIBUTION OF PROPOSED**  
) **SETTLEMENT NOTICE AND TO**  
) **SET A HEARING DATE FOR THE**  
) **PUBLIC FAIRNESS HEARING**

Plaintiffs and the ATS Defendants (collectively, the “Settling Parties”), jointly file this supplemental submission in support of Plaintiffs’ Unopposed Motion to Grant Preliminary Approval of the Proposed Class Action Settlement (the “Motion” - Docket # 39). In accord with prior oral and written representations made to the Court by the Settling Parties, attached hereto as ***Exhibit 1*** find the Settling Parties’ Amended Class Action Settlement Agreement (the “Amended Agreement”) for the Court’s consideration. The Amended Agreement completely supersedes and replaces the Settling Parties’ original Class Action Settlement Agreement executed on December 28, 2012. The Amended Agreement was arrived at through arms-length negotiations after the February 13, 2013, and March 11, 2013, hearings.

If the Court should require any additional information, the Settling Parties are happy to accommodate in any way possible. A proposed Order is attached hereto as ***Exhibit 2*** for the Court's consideration.

On behalf of the Plaintiffs,

Dated: March 13, 2013

By: Stephen P. DeNittis /s/  
Stephen P. DeNittis  
Joseph A. Osefchen  
SHABEL & DeNITTIS, P.C.  
525 Route 73 North  
5 Greentree Centre, Suite 302  
Marlton, NJ 08053  
Tel: 856-797-9951

Dated: March 13, 2013

By: /s/ Ross H. Schmierer  
Ross H. Schmierer  
Bryan H. Mintz  
PARIS ACKERMAN & SCHMIERER  
101 Eisenhower Parkway  
Roseland, NJ 07068  
Tel: 973-228-6667

On behalf of the ATS Defendants,

Dated: March 13, 2013

By: Benjamin C. Caldwell /s/  
Benjamin C. Caldwell  
Robert D. Friedman (admitted *pro hac vice*)  
BURNS & LEVINSON LLP  
1 Citizens Plaza, Suite 1100  
Providence, RI 02903  
Tel: 401-831-8330

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of March, 2013, I electronically filed the foregoing document in the above-entitled matter with the Clerk of the Court using the CM/ECF system. CM/ECF participants will receive notice electronically.

Benjamin C. Caldwell /s/  
Benjamin C. Caldwell